

# SOOL Psychology

## PRIVATE STATEMENT

March 3, 2022

### **Introduction**

SOOL Psychology (“we”, “our” or “us”) promises to respect any personal data you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn’t reasonably expect.

### **We collect information in the following ways:**

When you contact us either via our website or via our Facebook page; we will keep your contact information until you have contacted us and continued to make an appointment. In those cases, you do not proceed to make an appointment, your details are removed from our records. We do not use cookies at our website, and hence do not gather information about you that way.

When you give it to us directly; This typically happens during the intake meeting and normally includes, address, telephone number, email address and date of birth. When you give us this information we take responsibility for looking after it safely and in those cases, you choose not to commence therapy, your records will immediately be deleted.

When you give it to us indirectly; Your information may be shared with us by independent organisations, typically the counseling department at school that cooperates with us or a General Practitioners or Psychiatrist. These independent third parties will only do so when you have indicated that you have given consent to share this data with us. In those cases that you choose not to proceed to become a client with us, your personal information will be deleted.

### **What personal data we collect and how we use it**

In addition to the data gathering mentioned above, when becoming a client, we will ask for additional information in order for us to be able to best support

you overcoming the complaints you have contacted us to get help with. This concerns typical medical and psychological information such as:

- Your date of birth
- Information relating to your physical health
- Information relating your psychological and psychiatric health
- Your personal history, so that we can identify early traumas
- Any disabilities so that we can provide assistance where needed

We will mainly use your data to make medical and psychological decisions how to best help you.

### **Marketing Communications**

We will not be using your private information for any kind of marketing activities, such as direct marketing, newsletters, email offers etc.

### **How we keep your data safe and who has access**

Personal data collected and processed by us may not at any time be shared with any other person than the psychologist treating you. The only exception to this would be in the two following cases:

- If you as a client discloses information which may place any person in immediate and real danger of injury or abuse, then SOOL Psychology may disclose such information as may prevent that abuse or injury. This would include drugs or arms smuggling or acts of terrorism.
- If a legally constituted Judicial Court issues a subpoena then SOOL Psychology has no alternative but to release the record in question.

In some cases, some clients may be in need of additional medical support and supervision by a psychiatric medical doctor. In those cases, we will only share your data if we have your explicit and informed consent. This may also be the case when treating children and adolescents, and when sharing information with their school counselor may be preferred. This will only ever happen after written consent from the parents and with explicit and informed consent of the underage client.

### **Keeping your information up to date**

We only use the record of clients provided by our clients during the intake meeting as described above. We really appreciate it if you let us know if your contact details change. After the course of therapy is concluded, we will ask to keep

your records for an additional ten-year period, but we do so only after having stripped your record of your name and contact details as well as after your informed consent.

### **Understanding the detail of our data security measures**

When we process your data, we will already have carefully assessed the lawful justification for doing so, the parameters in which the data is processed, the length of time the data is held for, the secure storage of your data and undertaken impact assessments to ensure your rights are delivered. An overview of this analysis can be made available and records of our assessments can also be accessed by contacting us at [soolpsychology@gmail.com](mailto:soolpsychology@gmail.com) . You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them. If you want to access your information, you must write to us with a description of the information you want to see and the required proof of your identity by post to SOOL Psychology, 13 Am Gronn, 5222 Sandweiler, LUXEMBOURG. We do not accept these requests by email in order for us to ensure that we only provide personal data to the right person. If you have any questions please send these to [soolpsychology@gmail.com](mailto:soolpsychology@gmail.com)

### **Changes to this statement**

We may change this Privacy Statement from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our Website or by contacting you directly. If you have any questions, comments or suggestions, please let us know by contacting [soolpsychology@gmail.com](mailto:soolpsychology@gmail.com)